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ATTORNEY FOR DEFENDANT KNEKO TYRAY MOORE

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,
Plaintiff,

vs.

KNEKO TYRAY MOORE,
Defendant(s).

Case No. 3:20-cr-00474-JO-1

**DECLARATION OF
MATTHEW SCHINDLER IN
SUPPORT OF
UNOPPOSED MOTION TO
CONTINUE TRIAL DATE**

The undersigned, as counsel for Kneko Moore, does swear under penalty of perjury that the following is true:

1. I was initially retained as counsel by Mr. Moore relative to a supervised release violation matter under Case Number 3:16-cr-00068-JO-1.
2. Mr. Moore has been detained and is currently imprisoned in the Columbia County Jail. Trial is currently set for December 29, 2020.
3. During the pendency of the supervised violation hearing, the government indicted Mr. Moore on a new felon in possession of firearm charge which is the above captioned case.

4. Consistent with local practice, the government and defense have been conferring on discovery issues. Most have been resolved and it appears that Mr. Moore will soon have all requested materials that the government will produce. The time request in this motion will allow us to complete discovery.
5. It is highly likely that the defense will be seeking police communications beyond those that have been provided by the government. Based on experience, that process will take time. More time is necessary to complete this work.
6. More time is needed to complete investigation and interview fact witnesses. More time is needed to vet the government's DNA evidence.
7. More time is needed to draft a motion to suppress and to allow the government to respond.
8. I have spoken with Mr. Moore about his rights to a trial within the time limits of the speedy trial act. He understands those rights and agrees to waive them consistent with this request for continuance.
9. The government has no objection to this request.
10. The court is also asked to continue the supervised release violation hearing in Case Number 3:16-cr-00068-JO-1 along with this trial date.

Respectfully submitted on March 19, 2021.

s/Matthew Schindler

Matthew A. Schindler, OSB#964190

Attorney for Kneko Moore